

1:18-cv-140 (LEK/DJS)

Exhibit A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF ~~DECATUR~~ ULSTER *mc*

JO ANN LORBERER, on behalf of herself and those
similarly situated,

Plaintiff,

v.

HUDSON VALLEY NEWS DISTRIBUTORS, LLC,

Defendant.

SUMMONS WITH NOTICE

Index No. 17-2475

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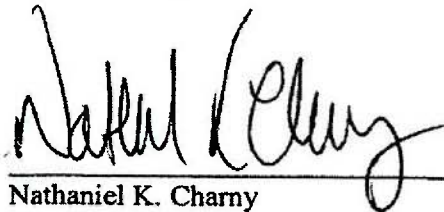
**Nina Postupack
Ulster County Clerk**

TO THE ABOVE NAMED DEFENDANT:

PLEASE TAKE NOTICE THAT YOU ARE HEREBY SUMMONED to appear in this action by serving a notice of appearance on the plaintiff at the address set forth below, and to do so within 20 days after the service of this Summons (not counting the day of service itself), or within 30 days after service is complete if the summons is not delivered personally to you within the State of New York.

YOU ARE HEREBY NOTIFIED THAT should you fail to answer or appear, a judgment will be entered against you by default for the relief demanded below.

Dated: Rhinebeck, New York
September 14, 2017



Nathaniel K. Charny
Charny & Wheeler
9 West Market Street
Rhinebeck, New York 12572
Tel - (845) 876-7500
Fax - (845) 876-7501

Attorneys for Plaintiff Jo Ann Lorberer

TO: Hudson News Distributors LLC
701 Jefferson Road
Parsippany, New Jersey 07054

Notice:

The nature of this action is: Discrimination in the workplace based gender and based on age in violation of the Age Discrimination in Employment Act, 29 USC Sections 621 et seq., Title VII of the Civil Rights Act of 1964, 42 USC Sections 2000eet seq. and the New York State Human Rights Law, N.Y. Executive Law Sections 290 et seq.; all arising out of Defendant's "layoff" of older female workers in October 2015.

The relief sought is: actual and compensatory damages, reinstatement or front pay damages, equitable relief prohibiting the violations, attorneys fees and costs, and pre- and post-judgment interest.

Should defendant fail to appear herein, judgment will be entered by default for the sum of \$1 million with interest from the date of October 1, 2015.

Venue:

Plaintiff designates Ulster County as the place of trial. The basis of this designation is Plaintiff's residence.